

## REMARKS

Claims 19-38 are pending in this application. In the Office Action, claims 19 and 32 were objected for containing a misspelled word; claims 19-20, 22, and 24-37 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 5,933,816 (Zeanah et al.); and claims 21, 23, and 38 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Zeanah et al. in view of "Database System Concepts" (Korth et al.).

By this amendment, Applicant has amended claims 19 and 32. Reconsideration in view of the following remarks is respectfully requested.

### I. OBJECTION TO CLAIMS 19 AND 32

The Office objected to claims 19 and 32 for including the wording "undue" rather than the appropriate wording "undo." In response, Applicant has amended the claims to correct the error. As a result, Applicant respectfully requests withdrawal of this objection.

### II. REJECTION OF CLAIMS 19-20, 22, AND 24-37 UNDER 35 U.S.C. § 102(e)

With respect to claims 19-20, 22, and 24-37, Applicant submits that the cited art fails to teach each and every element of the rejected claims. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); see MPEP § 2131, p. 2100-69. Because several elements of the claimed invention are not found in Zeanah et al., Applicant respectfully requests withdrawal of this rejection.

## A. THE MAIN MODULE

Applicant respectfully submits that Zeanah et al. fails to teach “a main module for initiating an application transaction based on a banking transaction” as claimed in independent claims 19 and 32. The Office alleges that the session services set of Zeanah et al. “relates to the main module in the application.” The Office further alleges that the transaction services set of Zeanah et al. anticipates the set of application transactions of the claimed invention. As discussed in Zeanah et al., the session services instantiate several components when a session begins (see col. 19, line 36 - col. 20, line 27). However, all of the instantiating by the session services are completed before the customer has been authenticated, let alone a banking transaction has been requested (see remainder of walk-through examples discussion starting at col. 20, line 28, and Figure 4C). Additionally, as shown in Figure 4C, the transaction applications set has not even been instantiated. In fact, as discussed further below, the mini-app dialog component (also not instantiated by the session services set) is responsible for instantiating the transaction executor components in Zeanah et al. As a result, the session services set of Zeanah et al. fails to disclose or suggest “a main module for *initiating an application transaction based on a banking transaction.*”

## B. THE SET OF APPLICATION TRANSACTIONS

Applicant respectfully submits that the transaction services set of Zeanah et al. fails to teach “a set of application transactions, wherein each application transaction can process a unique banking transaction and can undo the unique banking transaction” as claimed in independent claims 19 and 32. In Zeanah et al., “the transaction services set 90 handles external

service provider transactions needed to accomplish particular business functions. The components within the transaction services set 90 provide transaction coordination and external service provider message formatting.” Col. 14, lines 43-47. To summarize, the transaction services set provides a communications link between the mini-app dialog 83 and ESP I/F services 100 for the business functions, as shown in Figure 2.

This is in sharp contrast to the claimed invention, in which each application transaction “can process a unique banking transaction *and can undo the unique banking transaction.*” The Office cites references to the back door man component, the session component, and the presentation manager component of Zeanah et al. as allegedly anticipating the undoing of banking transactions by the application transaction. However, Applicant notes that none of the cited components are part of the transaction services set. Consequently, even if, *arguendo*, Zcanah et al. teaches the undoing of banking transactions, Zeanah et al. fails to teach including both the ability to process and undo banking transactions in the same component.

Further, the application transactions of the claimed invention process banking transactions in a *platform independent* manner. For example, the message formatter module provides data on banking transactions based on the messages, and the system processing functions provide a platform independent interface with the server. In sharp contrast, “[t]he transaction executor component 91 formats messages to be sent to external service providers... [and] also parses response messages.” Col. 14, line 66 - col. 15, line 6. Consequently, in so far as the transaction services set of Zeanah et al. is analogous to the application transactions of the claimed invention, it teaches away from application transactions that are implemented in a platform independent manner. As a result, Applicant respectfully submits that the transaction

services set of Zcanah et al. fails to disclose or suggest the application transactions of the claimed invention.

### C. THE SET OF KNOWLEDGE BLOCKS

Applicant respectfully submits that the mini-app dialog component of Zcanah et al. fails to teach "a set of knowledge blocks, wherein each knowledge block can implement a unique banking operation and can undo the unique banking operation" as claimed in independent claims 19 and 32. Zcanah et al.'s "mini-app dialog component 83 manages the dialog with a customer for a specific business function in a specific dialog style... The mini-app dialog component 83 presents information and choices to the customer and collects and validates customer inputs." Col. 13, lines 13-20. "The mini-app dialog component 83 instantiates and calls transaction executor components 91 to do transactions..." Col. 13, lines 52-53. Initially, Applicant notes that the Office fails to cite any portion of Zcanah et al. as allegedly anticipating the portion of the claimed invention "wherein each knowledge block... can undo the unique banking operation."

Further, as cited above, the mini-app dialog component of Zcanah et al. obtains the necessary information for a transaction, and calls a transaction executor component to do the transaction. This is in sharp contrast to the knowledge blocks of the claimed invention. Initially, the functionality of the knowledge blocks and mini-app dialog component are unrelated. The primary purpose of the mini-app dialog component is to obtain the necessary information for a transaction. The mini-app dialog component "instantiates and calls transaction executor components to do transactions." In contrast, each knowledge block can implement and undo a

banking operation. Consequently, the functionality of the mini-app dialog component fails to anticipate the functionality of the knowledge blocks.

Even further, the various components cited by the Office as allegedly anticipating aspects of the claimed invention do not interact in a similar manner. For example, in the claimed invention, the knowledge blocks are triggered by an application transaction. Therefore, if the Office's analogies are correct, the mini-app dialog component (knowledge block) would be triggered by the transaction services set (application transaction). However, the mini-app dialog component "instantiates and calls" members of the transaction services set. Consequently, this portion of Zeanah et al. clearly does not anticipate the knowledge blocks of the claimed invention. As a result, Applicant respectfully submits that Zeanah et al.'s mini-app dialog component fails to disclose or suggest the knowledge blocks of the claimed invention.

#### **D. THE SET OF SYSTEM PROCESSING FUNCTIONS**

Applicant respectfully submits that Zeanah et al. fails to teach "a set of system processing functions for providing a *platform independent interface* between the business platform and each computer" as claimed in independent claims 19 and 32. The Office apparently alleges that the independence of mini-app dialog components from one another, and the fact that these components include various rule files discloses this portion of the invention. However, the independence of one mini-app dialog component from another mini-app dialog component is unrelated to the independence of the business platform (including the application transactions, main module, and message formatter) from the computer(s) on which it is implemented. Similarly, the manner in which the mini-app dialog components are implemented (i.e., using

various rule files) is also unrelated to providing an interface to make the business platform independent from the particular computer(s) on which it is implemented. As a result, Applicant respectfully submits that Zeanah et al. fails to disclose or suggest the system processing functions of the claimed invention.

#### **E. COMMON FUNCTIONS**

Applicant respectfully submits that Zeanah et al. fails to teach “a set of common functions, wherein each common function performs a unique business function” as claimed in claims 20 and 35. In Zeanah et al., “each transaction executor component 91 performs a particular business function... by doing transactions with external service providers... The transaction executor component 91 formats messages to be sent to external service providers and orchestrates complex transactions by sending messages to multiple service providers...” Col. 14, line 55 to col. 15, line 10. In summary, each transaction executor component communicates with external service providers for a particular business function.

Zeanah et al. defines the term “business function” differently from the current application. As a result, the operation of the transaction executor components of Zeanah et al. is unrelated to the common functions of the claimed invention. In Zeanah et al., the term is used to refer to multiple business transactions. For example, Zeanah et al. refers to business functions as “transferring funds or bill payment.” Col. 13, lines 16-18. Other examples include cash withdrawal, deposit, etc. These examples are referred to as “banking transactions” in the application. In sharp contrast, the application defines common functions as *non-financial* which cannot “perform a complete business operation independently.” p. 34, lines 4-5. The common

functions are limited to functions that are repeatedly used in various financial transactions such as interest calculations, or data inquiries. As a result, Applicant respectfully submits that the transaction executor components of Zeanah et al. fail to disclose or suggest the common functions of the claimed invention.

#### **F. DATABASE INTERFACE AND FILE INTERFACE MODULES**

With further respect to independent claim 32 and claims 24 and 25, Applicant respectfully submits that Zeanah et al. fails to teach the database interface module or the file interface module as claimed in the application. In particular, Zeanah et al. is devoid of any discussion of providing *platform independent interfaces* to ease implementation of the system on various platforms (i.e., computing environments). Different platforms often use different database software, or have different file systems. Consequently, the ability to limit the number of modifications to the system in order to implement the system on various platforms is beneficial. The current invention solves this problem by providing platform independent interfaces for the modules that implement the transaction processing. The discussion pointed out by the Office teaches, at most, that files and databases can be used, however, it is absent from even recognizing the problem that different database and file systems may be desired for different implementations. As a result, Applicant respectfully submits that Zeanah et al. fails to disclose or suggest the database interface module or the file interface module of the claimed invention.

### III. REJECTION OF CLAIMS 21, 23, AND 38 UNDER 35 U.S.C. § 103(a)

With respect to claims 21, 23, and 38 Applicant respectfully submits that the cited art fails to render the claimed invention obvious. The test for obviousness is what the combined teachings of the prior art would have suggested to one of ordinary skill in the art. See, for example, *In re Keller*, 642 F.2d 413, 425, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). The MPEP requires that three basic criteria be met to establish a prima facie case for obviousness. See MPEP § 2143, p. 2100-122. First, the art must provide some motivation or suggestion for the invention. Second, there must be a reasonable expectation of success. Finally, the references must teach or suggest all the claim limitations.

Initially, Applicant notes that Zeanah et al. either alone or in combination with Korth et al. does not teach all the claim limitations of claims 21 and 23. These claims depend from independent claim 19. As discussed above, Zeanah et al. fails to teach several aspects of the independent claim. Consequently, Zeanah et al. also fails to teach several aspects of dependent claims 21 and 23.

Regarding claim 38, Applicant respectfully submits that the cited art fails to teach or suggest "automatically generating a database interface module" or "automatically generating a file interface module" as claimed in independent claim 38. As previously discussed in section II, F, Applicant notes that Zeanah et al. is devoid of any discussion regarding platform independent database and file interface modules. Consequently, Zeanah et al. is also devoid of any discussion regarding "automatically generating" the database and file interface modules.

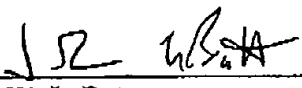
As a result, Applicant respectfully requests withdrawal of the rejection of claims 21, 23, and 38 as allegedly being obvious in light of Zeanah et al. in view of Korth et al.



#### IV. CONCLUSION

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

  
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Hu, Shiann-Jong

Art Unit: 3625

Serial No.: 09/634,435

Docket No.: JA999802

Filing Date: 08/08/2000

Examiner: Garg, Yogesh C.

Title: METHOD AND SYSTEM FOR INTEGRATING CORE BANKING BUSINESS PROCESSES

Box Non-Fee Amendment  
Commissioner for Patents  
Washington, D.C. 20231

VERSION OF CLAIMS WITH MARKINGS TO SHOW THE CHANGES MADE

19. (Amended) A system for developing a banking transaction processing system that processes banking transactions for accounts, wherein terminals can request banking transactions by sending messages to the banking transaction processing system, comprising:

a business platform for receiving messages and processing the banking transactions,

including:

a set of application transactions, wherein each application transaction can process

a unique banking transaction and can [undue] undo the unique banking transaction;

a main module for initiating an application transaction based on a banking transaction; and

a message formatter module for providing data on banking transactions based on the messages requesting the banking transactions;

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a set of knowledge blocks, wherein each knowledge block can implement a unique banking operation and can [undue] undo the unique banking operation, wherein at least one application transaction [uses] triggers at least one knowledge block to process the unique banking transaction;

a set of system processing functions for providing a platform independent interface between the business platform and a server; and

an interface that allows a user to add each of [an] a new application transaction and a new knowledge block.

32. (Amended) A system for processing banking transactions, comprising:

a plurality of terminals for generating messages, wherein each message requests a banking transaction;

a business platform, stored on at least one computer, including:

a set of application transactions, wherein each application transaction can process a unique banking transaction and can [undue] undo the unique banking transaction;

a main module for initiating an application transaction based on a banking transaction;

a message formatter module for providing data on a banking transaction based on a message requesting the banking transaction;

a database interface module for providing a platform independent interface between the main module and at least one database;

an external interface module for providing a platform independent interface

between the main module and the terminals; and

a file interface module for providing a platform independent interface between the main module and a file system of the at least one computer;

a set of knowledge blocks, wherein each knowledge block can perform a unique banking operation and can [undue] undo the unique banking operation, and wherein at least one banking transaction is processed using at least one banking operation; and

a set of system processing functions for providing a platform independent interface between the business platform and each computer.